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6  
7 **UNITED STATES DISTRICT COURT**  
8 **DISTRICT OF NEVADA**

9  
10 SATA GmbH & Co. KG, a German  
Corporation,

11 Plaintiff,

12 v.

13 Qingdao Hanspray New Material  
14 Technology Co. a Chinese Company;  
15 Qingdao Hanbo Plastic Technology Co. Ltd.,  
a Chinese Company; and Hanspray  
16 Industries Holdings Co., Ltd., a Chinese  
Company,

17 Defendants.  
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Case No.: 2:22-cv-01832-GMN-EJY

**STIPULATION AND ORDER TO  
EXTEND THE DEADLINE TO FILE  
REPLY IN SUPPORT OF MOTION TO  
DISMISS**

**(First Request)**

19 Pursuant to Federal Rule of Civil Procedure 6(b)(1) and Local Rule 1A 6-1, Plaintiff  
20 SATA GmbH & Co. KG (“Plaintiff” or “SATA”) and Defendants Qingdao Hanspray New  
21 Material Technology Co. a Chinese Company; Qingdao Hanbo Plastic Technology Co. Ltd., a  
22 Chinese Company; and Hanspray Industries Holdings Co., Ltd., a Chinese Company, (collectively  
23 “Defendants” or “Hanspray Defendants”), by and through their respective counsel of record,  
24 hereby agree and stipulate to a 14-day extension of time for Defendants to file and serve their  
25 Reply brief in support of Defendant’s Motion to Dismiss (ECF 15) from the current deadline of  
26 January 26, 2023, up to and including February 9, 2023. This is the first request by the parties for  
27 such an extension.

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1 Federal Rules of Civil Procedure 6(b) provides in pertinent part that “[w]hen an act may  
 2 or must be done within a specified time, the court may, for good cause, extend the time: (A) ... if  
 3 request is made, before the time or its extension expires ....” Fed. R. Civ. P. 6(b). Indeed, “[u]nder  
 4 Federal Rule of Civil Procedure 6(b), the court may, for good cause, extend a deadline if a request  
 5 is made “before the original time or its extension expires .... The Ninth Circuit has equated good  
 6 cause with the exercise of due diligence.” *Maxson v. H&R Block, Inc.*, Case No.: 2:16-cv-00152-  
 7 APG-CWH, 2017 WL 1078633, at \*2 (D. Nev. Mar. 21, 2017) (citations omitted).

8 This stipulation is made before the expiration of the “original time” and good cause exists  
 9 for the stipulated extension to provide Defendants with an opportunity to consult with their  
 10 undersigned Defense counsel in this matter. Defendants who are all Chinese entities are currently  
 11 closed in connection with the Chinese New Year Holiday and will not be able to consult with  
 12 counsel with regard to the Reply to the Opposition to Defendants’ Motion to Dismiss (ECF 20)  
 13 in this patent infringement action until Defendants’ business re-open next week. Further, because  
 14 such communications have, and likely will continue to, require the employment of translation  
 15 services both for oral consultation and document review, such additional time is required.

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1 For the foregoing reasons, the parties hereby stipulate to extend the deadline for the  
2 Defendants to file its Reply in support of its Motion to Dismiss to February 9, 2023.

3 DATED: January 26, 2023.

4 **IT IS SO AGREED AND STIPULATED:**

5 **DICKINSON WRIGHT PLLC**

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*Attorneys for Defendants, Qingdao Hanspray  
New Material Technology Co.; Qingdao  
Hanbo Plastic Technology Co. Ltd.; and  
Hanspray Industries Holdings Co., Ltd.*

16 **IT IS SO ORDERED:**

17   
18 UNITED STATES MAGISTRATE JUDGE

19 DATED: January 27, 2023